Exhibit A – Richard Youngblood Rebuttal (Addresses factual disputes and directly challenges misleading claims against Defendant)

REBUTTAL STATEMENT OF RICHARD YOUNGBLOOD

I, Richard Youngblood, declare under penalty of perjury under the laws of the United States that the following statements are true and correct to the best of my knowledge and belief.

1. My Account is Truthful and Consistent

The plaintiff attempts to discredit my testimony by alleging that my claims are motivated by bitterness or personal gain. This is untrue. My sworn statement details events that occurred in the late 1980s, which I have carried privately for decades. The core issue here is not my personal history but rather the specific actions of Bishop T.D. Jakes that I personally experienced.

Furthermore, I never wavered in my account of the incident in the EconoLodge in Westover, WV. The fact that I shared what happened with a church elder immediately after the incident (Silas Wheeler) shows that I was not fabricating this decades later for personal gain. If my intentions were deceitful, why would I have confided in others at that time?

Additionally, I confided in Minister Derrick Faison, who lived in the duplex with me. When I asked if Bishop Jakes had ever tried anything with him, he responded, "I've never been woke up with nothing like that." This statement further proves that I was seeking understanding about what had happened to me.

Beyond confiding in church members, I also shared the incident at the EconoLodge with my wife. She was aware of what had happened, proving that I did not carry this burden alone from the very beginning.

2. The Relationship Started Getting Weird

At first, my relationship with Bishop Jakes seemed like that of a mentor and mentee, but over time, things began to shift in ways that made me uncomfortable. The conversations he had with me started becoming more personal, shifting away from ministry to more intimate discussions. He once shared an inappropriate story about how he taught his wife to perform oral sex on him, a conversation that left me disturbed. At that point, I began to feel uneasy about our interactions. The dynamic between us changed, and I started questioning the true nature of our relationship and the way he perceived me.

3. I Have No Personal Vendetta Against Bishop Jakes

At no point have I spoken out against Bishop Jakes out of anger, revenge, or personal vendetta. I have simply told the truth about what happened to me—an experience that I have borne for nearly 40 years.

Like many others, I once believed that I was following a man of God who had integrity—a spiritual leader who could guide me in my ministry. I was willing to uproot my life, move my family, and dedicate my time and effort to serving in his ministry. However, what I discovered was not the man I thought I was following. Instead, I came to realize that Bishop Jakes was at best bisexual and at worst a closeted homosexual—something that deeply conflicted with the image he projected to his followers and the church at large.

For years, he built a public reputation that made people believe he was the next great spiritual leader of our time. In fact, he was even featured on the cover of TIME Magazine as "The Next Billy Graham." But the truth is, that title was a lie—a deception carefully crafted while he continued to hide who he really was. He knew he had never confronted his own issues, yet he allowed millions to believe he was an untouchable, righteous leader.

The world saw a man of God, but behind closed doors, I saw a different man entirely. That realization, along with the weight of what I personally endured, has caused me great emotional, spiritual, and mental anguish.

This was not just a momentary betrayal—it was a life-altering deception that affected every part of my being. The pain of carrying this burden privately for decades has taken a deep toll on me.

4. My Decision to Speak Out in 2008 Had Nothing to Do with My Brother

The plaintiff falsely claims that I spoke out in 2008 because of resentment over Bishop Jakes not supporting my brother, Duane, in a legal case. This is completely false and a misrepresentation of the truth.

The real reason I spoke out in 2008 had nothing to do with my brother. It was triggered by a photo of Bishop Jakes taken at his daughter's wedding, where he was wearing two earrings. Seeing that image brought back the memories of what I had experienced firsthand and made me realize that the man the world saw was not the man I knew behind closed doors.

5. I Have Never Asked for a Job at The Potter's House

The plaintiff has falsely claimed that I approached Bishop Jakes seeking employment at The Potter's House. This is completely untrue. At no point have I ever asked for a job or any form of financial assistance from Bishop Jakes or his ministry. Furthermore, I did not see Bishop Jakes at TBN, nor did I ask him for a job at The Potter's House. This is an attempt to discredit me and misrepresent my intentions in coming forward with my story.

6. Bishop Jakes' Response to My Departure Proves His Manipulation

When I confronted Bishop Jakes about what had happened, his reaction was not one of denial but of control.

- He told me I was no longer welcome at his church and immediately called my wife, telling her that I was a liar and that she should beware of me.
- When I asked why I was no longer welcome, he responded, "Who are you going to tell?
 Wilson?" referring to Chief Apostle Wilson of the organization.
- He then added, "What's he going to do? He's sleeping with Frankie and Johnny."
- In another private meeting in his office, he told me, "Sometimes too much light hurts the
 eyes."

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These responses are not those of an innocent man, but of someone concerned about maintaining control.

7. The Impact on My Life and My Family

Beyond the incident itself, the events that occurred have had a lasting impact on my life, my exwife's life, and my children's lives. Because of what happened and how Bishop Jakes responded, my marriage fell apart, and my children had to grow up in a broken home.

The plaintiff accuses me of being a poor father, yet fails to acknowledge his own role in damaging my family. His direct phone call to my wife, where he told her that I was a liar and that she should beware of me, played a significant part in our separation. Furthermore, the very wife and children that he now claims I failed to take care of were the same ones who, at times, cooked meals that we then split with Bishop Jakes and his family because they did not have food. This signifies that he, too, was unable to take care of his own household, despite now attempting to judge me.

Conclusion

I have no personal vendetta against Bishop Jakes. I have simply spoken the truth about what happened to me. I have carried this burden for nearly 40 years, and my decision to speak out is based on that truth alone.

The plaintiff's attempt to rewrite history by falsely claiming I spoke out because of my brother is just another example of deflection and misdirection. The truth is, my decision to finally say something was triggered by the image of a man who had deceived millions—but could no longer deceive me.

Furthermore, I shared the EconoLodge incident with my wife at the time, meaning my account was not something I created years later—it was something I confided in my closest companion about from the very beginning.

Sworn and submitted by:

Richard Youngblood
Date: 2/17/2025

NOTARY PUBLIC ACKNOWLEDGMENT

STATE OF GEORGIA COUNTY OF GUERNNEZZ

On this 17 day of FEB, 2025, before me, the undersigned Notary Public, personally appeared Richard Youngblood, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument, and acknowledged that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.